Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of:	
ORDER OF DISMISSAL, by ALJ Richard Sippel	FCC 17M-35
In and regarding:	
MARITIME COMMUNICATIONS/LAND MOBILE, LLC	FRN: 0013587779
Participant in Auction No. 61 and Licensee of Various Authorizations in the Wireless Radio Services	EB Docket No. 11-71 File No. EB-09-IH-1751
Applicant for Modification of Various Authorizations in the Wireless Radio Services	
Applicant with ENCANA OIL AND GAS (USA., INC.; DUQUESNE LIGHT COMPANY; DCP MIDSTREAM, LP; JACKSON COUNTY RURAL MEMBERSHIP ELECTRIC COOPERATIVE; PUGET SOUND ENERGY, INC.; ENBRIDGE ENERGY COMPANY, INC.; INTERSTATE POWER AND LIGHT COMPANY; WISCONSIN POWER AND LIGHT COMPANY; DIXIE ELECTRIC MEMBERSHIP CORPORATION, INC.; ATLAS PIPELINE-MID CONTINENT, LLC; DENTON COUNTY ELECTRIC COOPERATIVE, INC., DBA COSERV ELECTRIC; AND SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY	Application File Nos.[1] 0004030479, 0004144435, 0004193028, 0004193328, 0004354053, 0004309872, 0004310060, 0004315903, 0004315013, 0004430505, 0004417199, 0004419431, 0004422320, 0004422329, 0004507921, 0004153701, 0004526264, 0004636537, and 0004604962
For Commission Consent to the Assignment of Various Authorizations in the Wireless Radio Service	
AMTS Site-Based Licenses of Maritime Communications/Land Mobile LLC (now held by Choctaw Holdings LLC)	Call Signs KAE889, WRV374 and WHG750
Maritime Communications/Land Mobile LLC's Second Thurdsay Application	Docket No. 13-85

To: Marlene H. Dortch, Secretary Attn: The Commission

REPLY TO MARITIME-CHOCTAW JOINT OPPOSITION TO APPEAL OF ORDER OF DISMISSAL, FCC 17M-35 [2]

[1] Some dismissed after Docket 11-71 commenced.

[2] The defined terms used herein have the same meaning given in the respective appeals. "EB" means the Enforcement Bureau and "MCLM" means Maritime Communications/Land Mobile LLC. FCC OGC granted an extension to file this reply today.

Warren Havens and Polaris PNT PBC (together, "Appellants") hereby jointly reply to MCLM's and Choctaw's joint opposition (the "MCLM-Choctaw Opp" or "Opposition") to their respective appeals of the Termination Order, FCC 17M-35 (the "Two Appeals"). Appellants separately reply to the opposition of the Enforcement Bureau's ("EB") ("EB Reply").

The Opposition (as does the EB Opposition) primarily makes procedural arguments why the Two Appeals should be dismissed or denied, while at the same time failing to address or refute the Two Appeals' showings that the Sippel Order, FCC 15M-14, is procedurally defective, and that the 11-71 proceeding is rife with procedural defects and failures, including by Judge Sippel and EB to fulfill the most fundamental purposes of the hearing as stated in FCC 11-64 (as shown in the Two Appeals). All of those substantial defects, as well as others, are good cause for the entire hearing to be found void and redone. Any alleged procedural defects (and Appellants dispute those defects) in an appeal cannot trump the major procedural defects within the 11-71 proceeding that preceded the Two Appeals.[3]

The Two Appeals pointed out major procedural and regulatory defects of ALJ Sippel's order FCC 15M-14 (e.g., throwing out parties when Sippel could not do that under the rule, accusing parties of filing a prohibited motion when it was permitted, etc.), which were then compounded by Judge Sippel and the Commission not acting on the pending appeals of FCC 15M-14 for over two years, while MCLM and EB worked out stipulations in 11-71 in the absence of the only opposing parties, and then Judge Sippel terminating the 11-71 proceeding and case without those pending appeals ever being decided, which now MCLM and EB

[3] For example, the EB presenting, prosecuting and defending MCLM's case; Judge Sippel never determining the issue of construction with any proper fact finding but instead relying on renewal applications that FCC 11-64 called into material question; MCLM never admitting to its actual ownership and control; Judge Sippel rewriting and misapplying Rule Section 1.251; Judge Sippel permitting stipulations in lieu of fact-finding; Judge Sippel improperly throwing out the only prosecuting parties, Havens and others; Judge Sippel and the Commission improperly sitting on Havens appeals for over 2 years, when interlocutory appeals are to be decided quickly; etc.

conveniently argue are moot—i.e. the EB, MCLM and Choctaw positions can only be construed to mean they think Havens has no rights or recourse to appeal an improper, adverse decision against him by Judge Sippel or the Termination Order or the actions in the 11-71 proceeding that were damaging and prejudicial to him as a party. Unlike the Two Appeals that are procedurally and substantively sound, the 11-71 hearing and the Termination Order that concluded it are clearly not, as shown by the Two Appeals, and the procedural and regulatory defects caused by Sippel's improper removal of parties by FCC 15M-14, and other improper actions by Sippel, EB and MCLM, cannot be cured by the Termination Order and improper denial of Appellants' rights, including to appeal and Due Process, under the Communications Act and Constitution.

Standing: (1) Appellants address standing in the EB Reply, which is referenced and incorporated herein. (2) The following is in addition: The Opposition's arguments that Havens does not have standing to file an appeal because he was thrown out of the 11-71 proceeding by Judge Sippel only highlight how improper Judge Sippel acted in the 11-71 proceeding and why a new hearing is needed, and how prejudicial and damaging it has been to Havens to have been improperly denied rights as a party and to defend his claims and interest to the MCLM-Choctaw FCC licenses (and the license applications that MCLM's predecessor-in-interest improperly blocked with invalid site-based stations—causing Havens significant damages).

Contrary to the Opposition's arguments, Havens showed he had standing and interest and the FCC's own orders show that he indisputably has standing, including HDO FCC 11-64, which made him a party to the 11-71 proceeding, based upon his party status to several challenge pleadings against MCLM and its predecessors-in-interest; and the FCC's Second Thursday Order, FCC 16-172, which named him as a party and decided on Havens' pleadings and did not find that he did not have standing to challenge MCLM and its licenses. MCLM and Choctaw lack candor for attempting to suggest that Havens does not have standing at this late date, and they are estopped from doing so based on the years' long challenge proceedings in which the

FCC did not find Havens lacked standing, but the opposite, as reflected by the aforementioned Commission two Orders, FCC 11-64 and FCC 16-172. In fact, FCC 16-172, at its footnote 2 states clearly, "The parties and pleadings referenced herein are identified in the Appendix." And the Appendix to FCC 16-172 lists Havens individually as a party. MCLM and EB cannot effectively refute that unless and until the Commission changes its decision, which is clear in the Second Thursday Order. Thus, the Commission's Second Thursday Order, FCC 16-172, shows that Havens has standing, because it addressed the facts and arguments raised by Havens and did not dismiss them for lack of standing.

Havens showed in the challenge pleadings to the Sippel Order, FCC 15M-14, (the petition for reconsideration filed by the Chadbourne firm, and in the interlocutory appeal filed by Chadbourne, and the later supplement to interlocutory appeal filed by the Lowenstein firm—all in Commission records in 11-71) that the Sippel Order's removal of Havens as a party was entirely improper under FCC rules. Since the removal was improper, Havens did not lose party status. In addition, the improper removal is good cause in itself for Havens to challenge the Termination Order and everything that came after the improper removal. Further, the appeals refer to Havens' 10/18/17 memo to Office of General Counsel that the Termination Order made the Sippel Order, FCC 15M-14, moot, and therefore, Havens became a party again for purposes of challenging the Termination Order.

In addition, FCC 15M-14 was based upon Section 1.251(f)(3), however, Judge Sippel improperly deleted words and added words in his description of that rule. That rule pertained to a decision that the Commission could make whether to add as an issue to the subject hearing the qualifications of the party, and if the Commission decided to add that, then the Judge could determine what sanctions may be appropriate. An extreme sanction would be to remove the party. However, in FCC 15M-14, Judge Sippel self-served that extreme sanction, while at the same time referring that question to the Commission. Thus, for that reason alone, the removal

was improper under the rule Judge Sippel cited to, Section 1.251(f)(3). The fact that both MCLM-Choctaw Opp and the EB's opposition raise this clearly improper removal as a defense in opposition to the Two Appeals only shows that MCLM, Choctaw and the EB have no good facts or arguments in opposition to the Two Appeals.

Also, throughout 11-71 proceeding and up to the Second Thursday Order, Havens' standing was not an issue. Even Judge Sippel in 11-71 accepted Havens' participation through to trial, including filing findings of facts and conclusions of law. Notably, the EB's Opposition does not argue that Havens does not have standing generally, but appears to concede that Havens has standing, but argues (as noted above) that somehow Havens lost standing when Judge Sippel improperly threw him out of the hearing, when only the Commission could do that and never did and now it is too late (see above discussion as to why that removal was improper and is grounds for a new hearing and provides further standing to Havens to appeal the Termination Order). Also, the fact that Havens continues to appeal FCC 15M-14, as argued in Havens' appeal, provides him standing to challenge the Termination Order, FCC 17M-35.

Page Limits: The Two Appeals do not exceed any page limit. Moreover, the Havens appeal clearly carved out any reference and incorporated pleadings that would be deemed to cause it to exceed any 25-page limit.[4] Although Havens believes that limitation is clear, he reiterates it here for clarity, and emphasizes again that he only references and incorporates those parts of his 10/6/17 Memo identified in his appeal, up to the point not exceeding any page limit for his appeal, and then any of his other pleadings to the extent the Commission does not deem them to

[4] The Havens appeal stated:

> To the extent that they are accepted by the Commission without exceeding the page limit for this Appeal (and if they are deemed to exceed such limit, then Appellant references and incorporates only up the pages of his *Memo in Support of and Related to Notice of Appeal* filed October 6, 2017, that discuss his legal interest and standing, up to the point at which this Appeal's page limit is not exceeded, in sequential order, starting on page 2 and continuing to page 12), Appellant references and incorporates herein the below-listed pleadings before the FCC….

exceed any page limit for an appeal. It is frivolous that MCLM, Choctaw and the EB raise such a procedural argument despite Havens' clear statements and limitation, that means the Two Appeals do not and cannot exceed any page limit.

Reference and incorporation of pleadings in other proceedings is for convenience and efficiency and permitted, and the materials referred to are already in the record before the Commission and are relevant to the instant proceeding and underlying matters.[5]

Service: Regarding MCLM-Choctaw Opp's assertion that the appeal should be dismissed because it was allegedly served on an "old" address for Choctaw counsel, that is a smokescreen argument. First, Choctaw and MCLM act jointly. One is agent of the other (both cannot separately control the subject licenses and associated matters.) Choctaw does not say it was prejudiced or that it did not get a copy of the appeals in time to oppose them. In fact, Choctaw filed a joint opposition with MCLM, and MCLM has not argued it did not get a copy of the appeals, and MCLM-Choctaw filed their joint opposition timely. Also, Two Appeals were filed in docket 11-71 and served on MCLM counsel and others, and an earlier notice of appeal was filed, making parties aware that an appeal was to be filed by the deadline. In addition, the MCLM-Choctaw assignment application, File No. 0005552500 (in pending status until July 2017), lists as a contact address for Choctaw the address listed on the appeals' certificates of service. Choctaw had a duty to update its contact information if it was outdated. Also, any use of an alleged "old" address versus an alleged "newer" address for Choctaw counsel was entirely inadvertent, and not intentional as the MCLM-Choctaw Opp suggests.

[5] Also, § 1.49(e) says to see Section 22.6 for specifications for electronic pleadings, but there are no specifications listed in Section 22.6. Thus, there are no specifications that apply to electronically submitted pleadings like the Two Appeals. Thus, there no FCC rule that could (but would not have to) provide details on specification of pleadings filed electronically as to the criteria for permissible reference and incorporation (among other matters).

No Declaration, Ownership-Control Unknown: The MCLM-Choctaw Opp does not contain any declaration by a party(ies) with direct knowledge of the factual matters that it is disputing. Thus, the MCLM-Choctaw Opp is defective and should be dismissed. In the 11-71 proceeding, MCLM never disclosed its actual ownership, control and real parties in interest, despite the facts cited in FCC 11-64 that call into material question the accuracy of MCLM's Form 602 filed for Auction 61 (facts that showed other owners, controllers, affiliates and interests). Since it never filed an accurate Form 602, the FCC does not know who the real parties in interest are in MCLM, including directing and authorizing any actions taken by MCLM before the FCC. The MCLM-Choctaw Opp should be deemed defective for that reason too. It is unfair and prejudicial to Appellants to have to respond to MCLM pleadings in that context.

MCLM-Choctaw Opp Section III. B: The EB clearly put on the case of MCLM. It overtly started when the EB supported MCLM's efforts to keep licenses in proposed settlements, stipulations and summary decisions, not only with no proof that the Commission's HDO called for in describing issue (g), but also avoiding the approximately 100 boxes of evidence directly relating to issue (g), that Havens found and preserved, at his own high cost, as Judge Sippel requested, and after the EB had asked the Judge whether it should issue formal discovery on Havens to make sure he would obtain and delivery that evidence. That is shown in the relevant transcript on that topic. No prosecutor actually properly pursuing a case for the government would avoid a massive amount of evidence that the accused party in its own statements (MCLM in this case) described as directly relevant, but destroyed. That is a smoking gun that that evidence, if found, will be damning as to that accused party. To this day, even in these two oppositions, the EB, along with its effective clients, MCLM and Choctaw, continue to avoid that evidence; Havens many times explained how to obtain that evidence. All that was required or is still required, is to request a copy from the clerk of the Bankruptcy Court in Mississippi that conducts the MCLM bankruptcy case. Concealing or destroying evidence in a federal

administrative hearing, or in bankruptcy, is a criminal violation under 18 USC §1519 (Destruction, alteration, or falsification of records in Federal investigations and bankruptcy).

MCLM-Choctaw Opp Section III C.: The Commission's HDO, FCC 11-64, did not call for "stipulated facts" but fact finding through serious discovery, where if the licensee could not deliver proof of timely and proper construction, and thereafter permanent operations and service, then finding must be that there are no facts to support construction and operation, and thus find automatic termination. Where MCLM could not produce that evidence, but falsely asserted it was destroyed, and where the EB would not obtain that evidence after Havens found it, it is nonsense to assert that MCLM and EB can manufacture "stipulated facts" to fulfill the mandate of the Commission in HDO, FCC 11-64, and justify 4 years of public resources spent by EB and ALJ office chasing ghosts and games offered up by MCLM, with Choctaw in support.[6]

MCLM-Choctaw Opp Section IV: FCC 11-64 makes clear that Havens' challenge filings against MCLM were not frivolous at all, but actually led to FCC 11-64 and the 11-71 hearing since the facts cited in FCC 11-64 in support of the Commission's decision come from Havens' (and others') challenge filings against MCLM and its predecessors. Also, MCLM sought Second Thursday relief in order to get out of the hearing on its geographic licenses because there was such substantial evidence it knowingly cheated at auction (Second Thursday relief is for purpose of ensuring that wrongdoers do not get a benefit): MCLM admitted it failed to disclose affiliates (numerous), attributable gross revenues, and controlling parties (at least a spouse), and that it did not qualify for a very small business bidding credit. Also, in the 11-71 hearing, MCLM admitted

[6] In addition, Choctaw first requested to enter the proceeding, and that was granted. However, when subject to discovery, Choctaw immediately disappeared, and obtained permission from the Judge to listen in on the hearing but to not be subject to discovery. The question must be raised as to what Choctaw was hiding by that quick disappearance, after it appeared for good cause as the successor to the subject licenses in this proceeding under the Chapter 11 plan. Who could have more interest than Choctaw in appearing and actively participating? The answer is no one, but for the parties wrongly affected, including Havens and his assignee, Polaris. The hearing should be redone as a new trial, where Choctaw and its agents will be subject to discovery.

that most of its site-based stations had not been operated since at least a time in 2007 (facts in record actually indicate longer) and that they were invalid and had terminated up to 2.5 years before it actually turned them back in—that was repeated, years long fraud by MCLM, by its own admission, and was done, per MCLM's admission, with knowledge of its legal counsel and its creditors and Choctaw. It is entirely frivolous for MCLM, Choctaw, and their legal counsel to argue that Havens is frivolous and sanctionable for his filings against MCLM in light of FCC 11-64, and when there are such clear ongoing, bad acts by MCLM in the record that were only discovered and revealed due to Havens' pleadings and efforts.

Re: Arnold Leong: MCLM and Choctaw engage in patently frivolous assertions that there is anything in a court pleading regarding Arnold Leong that "demonstrates" anything. Parties in litigation assert all kinds of things, but that does not create a demonstration that is accepted in that proceeding, what to speak of becoming a type of evidence to bring in a proceeding before another authority. If that was not the case, then virtually every substantial FCC licensee in the history of the Communications Act could be constantly brought before the Commission based on assertions in non-FCC legal actions. Attorneys for MCLM and Choctaw fully know that their assertions regarding Leong are violations of FCC Rule Section 1.52, as positions that they cannot support, but are interposed for delay—a smokescreen for their own weak positions. However, Havens has been clear in his own relevant references to the Leong position, that it is false, contradicted by Leong's own written documents and testimony, and preempted and void under requirements of the Communications Act, including 47 USC §310(d). As shown in Court pleadings, and one of Leong's own submissions to the FCC in year 2015, by attorney Stephen Coran, Havens informed Leong in writing that if Leong believed his position, that he should present it to the FCC when he commenced with the position close to well over a decade ago.[7]

[7] Havens may, however, proceed with a complaint against Leong before the Commission for his violations under the Communications Act that damage both Havens and the public interest. In

MCLM FCC Counsel Testimony Contradicts MCLM at FCC:[8] Under FCC rules, Mr. Keller's recent testimony in bankruptcy court is cause to overturn the Termination Order, redo the hearing, undo FCC 16-172 and related relief orders, and commence a further investigation into further MCLM fraud and misrepresentation, or better yet, find it disqualified for lack of character and fitness for repeated, ongoing misrepresentation (and to sanction Mr. Keller). Mr. Keller's statements are new *prima facie* facts calling into material question MCLM's factual assertions and representations to the FCC and ALJ Sippel in order to get relief under Second Thursday and in the 11-71 hearing. Had Mr. Keller's recent admissions been known all along by the FCC, then they may have caused the FCC and ALJ Sippel to rule and act differently. Appellants could not have known these admissions by Keller prior to his recent testimony because MCLM had maintained contrary positions before the FCC. Thus, they are presenting these here for the first time. In the public interest, these should be accepted and considered, because they show willful misrepresentation, lack of candor and fraud by MCLM.

The Termination Order is largely based upon the "Second Thursday", FCC 16-172, in Docket 13-85. That decision and docket in turn, is based upon the MCLM-Choctaw bankruptcy. Judge Sippel properly ruled that MCLM could not choose to give up AMTS stations it had alleged as valid and listed in its bankruptcy schedules without approval of the bankruptcy court (See Sippel Order, FCC 14M-18 at ¶¶68-72). However, license stations that are automatically terminated for permanent discontinuance or are otherwise invalid, are not legitimate bankruptcy

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that proceeding, Havens may seek discovery against MCLM and Choctaw, based upon evidence Havens already has that they have communications and relations with Leong involving the false and improper Leong positions, contrary to FCC law.

[8] The FCC can obtain a copy of the audio file for the 10/27/17 hearing in the MS bankruptcy hearing to confirm the below statements and positions taken by Keller that refute and contradict MCLM's positions in 11-71 and 13-85. Once Appellants have a copy of the official transcript, they will provide a copy to the FCC.

estate property, yet MCLM, by its own admissions to the FCC, maintained auto-terminated site-based stations in the bankruptcy action, while it tried to get relief for them at the FCC.

In MCLM's Response to Interrogatories, Aug. 4, 2014, in Docket 11-71, under penalty of perjury by Sandra DePriest, MCLM stated, "Shortly before May 31, 2012, after consultation with, inter alia, bankruptcy counsel, the secured creditors, and the unsecured creditor's committee, MCLM decided to permanently abandon these facilities." (Exhibit 3). MCLM stated in its 9/11/14 *Joint Stipulation Between the Enforcement Bureau and Maritime on Discontinuance of Operations of Previously Stipulated Site-Based Facilities*, in Docket 11-71, that it had permanently abandoned stations (years prior to submitting the joint stipulation) and that those stations had automatically terminated at that time. See, e.g., MCLM's 9/11/14 Joint Stipulation at its ¶¶ 48-51, 59-65 and 72-77 (Exhibit 2).[9]

However, contrary to the above cited response to interrogatories and Joint Stipulation, Mr. Keller testified at the bankruptcy court that (Exhibit 1). See Exhibit 1, Mr. Keller states the following at its page 11, lines 11-20 and page 12, lines 1-11:

> The stipulation in question was done prior to the trial on Issue G, which I thought was late 2014. But no, it is not my position that Maritime admitted to having terminated those licenses or permanently discontinued them years earlier. Our position before the Judge and our position here is that Maritime made the decision at the time of entering into that stipulation and making that finding with Judge Sippel. At that point they decided, OK, now we permanently abandon these licenses or terminate these licenses. We now surrender these licenses for cancellation. Up to that time Maritime never intended to permanently discontinue. They always intended to continue to pursue these licenses in the future, and that's the position that they took. And it was only as a tactical decision made at that time that they changed that position. So that's the part that I take issue with.

[9] Joint Stipulation at¶¶62-65:

> 62. Operations at site-based facilities KAE889 - Locations 6, 8, 12, 14, 22, 26-28, 33, 37, 39, 40, 44, and 46 have been permanently discontinued.
> 63. For the purposes of this proceeding, operations at KAE889- Locations 8, 14, 26-28, 33, 37, 39, 40, and 44 permanently discontinued as of May 31, 2012.
> 64. For the purposes of this proceeding, operations at KAE889 - 6, 12, 22 and 46 permanently discontinued as of December 2, 2013.
> 65. Pursuant to Section 1.955(a)(3) of the Commission's rules, 47 C.F.R. § 1.955(a)(3), site-based authorizations KAE889 - Locations 6, 8, 12, 14, 22, 26-28, 33, 37, 39, 40, 44, and 46 automatically terminated as of the dates of permanent discontinuance.

There was no admission of any permanent discontinuance years earlier or even weeks or months earlier for that matter.

And he states the following at Exhibit 1, page 16, lines 12-15:

> But no, there was absolutely no stipulation nor was there ever any concession that there was any permanent discontinuance prior to the time of the stipulation.

This shows MCLM's ongoing misrepresentation and fraud before the FCC and the bankruptcy court. MCLM is now admitting that it either misrepresented and lied in its 8/4/14 responses to interrogatories and its 9/11/14 Joint Stipulation filed with the FCC, or it is lying to the bankruptcy court. In either case, this Keller testimony constitutes sufficient new admissions for the Commission to overturn the Termination Order, commence a new hearing and investigation, and to call into question all of MCLM's representations in 11-71 and 13-85 to date. When the government disregards, attacks, and kicks away the whistle blower, and sides with demonstrated wrongdoers, there is a serious case to be made that the government proceeding is improper and must be done over, with new government employees. That applies here.

Respectfully submitted,

Warren Havens, an Individual

Warren Havens, President
Polaris PNT PBC

December 13, 2017

Warren Havens, and Polaris PNT PBC
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Declaration

I, Warren Havens, declare under penalty of perjury that the foregoing filing was prepared by me and that the factual statements and representations contained herein known to me are true and correct.

_____

Warren Havens

December 13, 2017

Certificate of Filing and Service

I, Warren C. Havens, certify that I have, on December 13, 2017: [*]1/

(1) Caused to be served, by placing into the USPS mail system with first-class postage affixed unless otherwise noted below, a copy of the foregoing filing to the following parties and other persons:[*]2/

Hon. Richard L. Sippel
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[*]1/ The mailed service copies being placed into a USPS drop-box today may be after business hours and thus may not be processed and postmarked by the USPS until the next business day.
[*]2/ Appellant does not admit by including any person on this list that they are a proper party to any matter described in this filing. Some are included out of an abundance of caution.

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(2) Caused to be filed the foregoing filing as stated on the caption page, and thus, as I have been instructed, [**]3/ provide notice and service to any party that has or may seek to participate in Dockets 13-85 and 11-71.

(3) Caused to be sent the foregoing filing via email to the following:
Office of the Inspector General
David Hunt, Inspector General, David.hunt@fcc.gov

[**]3/ The FCC Office of General Counsel informed me regarding others' filings concerning MCLM relief proceedings that I was served in this fashion. I assume OGC does not apply a different standard to others. If OGC has a different standard, it can make that clear and public.

Christopher Shields, agent, Christopher.shields@fcc.gov

Warren Havens